

**UNITED STATES DISTRICT COURT FOR  
THE SOUTHERN DISTRICT OF NEW YORK**

EASTERN PROFIT CORPORATION LIMITED	)	
	)	
	)	
Plaintiff,	)	
	)	
v.	)	Case No. 18-CV-2185 (LJL)
	)	
STRATEGIC VISION US, LLC	)	
	)	
Defendant.	)	
	)	

**[PROPOSED] ORDER GRANTING  
PLAINTIFF’S MOTION *IN LIMINE***

IT IS HEREBY ORDERED, this \_\_\_\_ day of \_\_\_\_\_, 2020, upon consideration of Plaintiff and Counterclaim Defendant Eastern Profit Corporation Limited’s (“Eastern”) Motion in *Limine* (the “Motion”), Eastern’s Memorandum of Law submitted in connection therewith, and Strategic Vision US, LLC’s opposition thereto, that Eastern’s Motion is hereby GRANTED. Strategic is PRECLUDED from seeking to admit the following into evidence at trial:

1. any testimony or documents that purportedly reflect out-of-court statements that certain of the subjects to be investigated under the Research Agreement were designated as so-called “records-protected”;
  
3. the newspaper and online articles that Strategic identified on its exhibit list as DX Nos. 32, 34, 41, 43, 44, 72, 73, 74, 77, 82, 87, 88, 89, 90, 92, 93, 94, 95, 101, and 116;
  
4. any testimony by any witness, including Sasha Gong, regarding whether certain actions or inactions by Mr. Guo are inconsistent with being a Chinese dissident that opposes the Chinese Communist Party, and relatedly, the documents that Strategic seeks to introduce for that purpose (DX Nos. 30-31, 33, 35-37, 51-52, 67, 70, 76, 78, 79, 81, 83-90, 92-114); and

5. any testimony regarding the subject-matters that Magistrate Judge Freeman has ruled to irrelevant and therefore inadmissible, including but not limited to testimony regarding the independent financial identity of Eastern, including its assets, liabilities, employees, practices and procedures and Golden Springs New York's business dealing with ACA Capital Group Limited.

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The Honorable Judge Lewis J. Liman